

Appendix 1 – Responses to objections – East Dulwich parking study

Ref	Objection/concern	Officer response	Uphold/partially uphold/reject
1.	All day zone is too restrictive for residents and businesses - should be 2 hours	<p>A two hour zone is usually recommended for addressing commuter issues. In the East Dulwich area however parking pressure is caused not just by commuters but by the presence of a number of schools and other destinations and workplaces such as services and shops. Dulwich community hospital is also in construction and thought to be a source of future parking stress. An all-day zone is therefore considered a more suitable restriction to address the types of parking issues in the area. The all-day operation also received the highest level of support in the consultation for respondents in the proposed zone.</p> <p>Residents' concerns that an all-day zone would not allow visitors such as informal carers, tradespeople and deliveries are unfounded. Based on previous zones, the implementation of a parking zone is likely to reduce the amount of cars in the area by 40% or more. Parking for visitors is likely to become easier as there will be more space. Visitors will be able to park in permit bays where one hour, five hour and all day visitor passes may be purchased by residents. Residents who have a Blue Badge can apply to have a disabled parking bay outside of their home. In addition, visitors can stay for a maximum of two hours for a fee in permit and paid bays.</p> <p>Officers will be instructed to review the parking zone six to nine months after implementation to ensure the zone is fit for purpose, and for a decision to be made to retain or amend operation days and times in consideration of the consultation results. Although officers are confident an all-day zone is a proportionate measure to address the local parking issues, in the event an all-day zone is found too restrictive by the majority of respondents, officers will explore changing or reducing the operation subject to statutory consultation.</p>	Reject

most affected by parking stress and the concerns of residents and businesses in regards to the perceived effect of parking restrictions on the local high street trade. The council is sympathetic to the increasing sources and severity of pressure on high streets such as internet shopping, rising rents and business rates, as well as concerns of potentially leaving a single EU market, and economic uncertainty in general.

The council reduced the very large initial study area consulted in January and February 2019 to a much smaller zone excluding, and to the west of, Lordship Lane. The zone was limited to side streets north of Melbourne Grove in an area where the majority of respondents were in support of a zone in their street. Following feedback from ward councillors to this interim recommendation, after a capacity Dulwich community council meeting, this area was reduced further to remove five side streets to Lordship Lane. The recommended zone therefore includes only three of the thirteen side streets to the shopping parade in Lordship Lane, as well as four side streets to Grove Vale, and Grove Vale itself.

Each side street has provisions for visitors to the high street, including retention of current free half hour parking operating all day Monday to Saturday. These bays will be “Stop and Shop” bays which offer more flexibility for shoppers than the current half hour restriction. Visitors will be able to extend their stay for up to two hours for a fee, after the initial first half hour free, thus allowing more time to make use of shops, cafes and other amenities in the local area. Permit and paid bays also allow for visitors to park for a fee for up to two hours.

The operation of the zone (Monday to Friday) avoids Saturday which is the busiest day for the high street based on the 2015 high street report from South Bank University and backed up by a recent study in March 2019 (both available at www.southwark.gov.uk/eastdulwichparking).

The March 2019 report shows that the most regular visitors are those walking and cycling or taking public transport. The shoppers are mostly made up of walkers, cyclists and public transport users on weekdays and weekends; they are most likely to visit 5+ more days in a week and are the largest mode-share to spend £20-£50. The higher level of spend £50-£100 is split evenly among the travel modes. Also, drivers do not dominate those travelling 1 hour or more as 75% of those people are travelling to Lordship Lane using public transport on weekends.

During the week of those visitors coming to Lordship Lane for the purposes of shopping or leisure the proportion travelling by private vehicle (car/taxi) is only 6%. During the week 30% of visitors surveyed said shopping or leisure was their reason for visiting while during the weekend the proportion rose to

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		<p>65%. The 2015 study on Lordship Lane also stated that three times the footfall occurs on a Saturday. The zone operation is limited to Monday to Friday and therefore would not affect the main day of trade (Saturday) and would impact only a very small portion of people travelling by car and parking in the zone, many of whom could switch to public transport, walking or cycling as most journeys made are 14 minutes or less . Based on results from these studies the potential displacement of parking is highly unlikely to have a significant effect trade on the high street.</p>	
3.	<p>Displacement on neighbouring roads (impact on families and carers/disabled residents)/zone should include Chesterfield Grove/the whole of Melbourne Grove</p>	<p>The final recommended zone area was based on the feedback from ward councillors after a very well attended community meeting. The feedback was to remove a group of side streets without majority support to form a coherent boundary which meant also removing Chesterfield Grove despite this street being undecided. The aim of the reduced zone is to provide a better fit to the streets that wanted a zone in their street.</p> <p>Chesterfield Grove was undecided between local residents who responded positively and negatively in the consultation. However, 74% of respondents from Ashbourne Grove opposed a parking zone in their street, as did 58% from the section of Melbourne Grove south of East Dulwich Grove and 56% from Bassano Street. The section of Melbourne Grove south of East Dulwich Grove was therefore removed along with Ashbourne Grove, Bassano Street and Chesterfield Grove which is located between these streets. The aim of the subsequent reduced zone was to provide an optimal fit to the streets that wanted a zone in their street based on the results of the consultation held in January and February 2019.</p> <p>While it is recognised that there is a risk of displacement of commuter parking to Ashbourne Grove, Chesterfield Grove and roads further south, the council wanted to reflect the feedback from the community and the consultation results.</p> <p>It should be noted that residents who have a Blue Badge can apply to have a disabled parking bay outside of their home.</p> <p>Where it is safe to do so, double yellow lines may be used for unloading for a period of up to 40 minutes.</p> <p>Objections to the proposed zone on the grounds that the zone is too small cannot be upheld as the zone cannot be extended in response to statutory consultation- it can only be reduced in size or hours reduced as long as they remain within the advertised time frame.</p>	Reject

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4.	<p>Implemented against wishes of majority (69% of respondents to the consultation were against a zone)</p>	<p>The consultation had a relatively high response rate of 37% (other zones typically receive 10-15% response).</p> <p>The key question asked residents if they wanted a zone in their street, not if they wanted a zone in general. It is inaccurate to state that 69% of respondents to the consultation rejected the zone as this was not how the question was framed.</p> <p>The final recommended zone is supported by the majority (62%) of respondents within the streets in the area recommended. Therefore the final zone is not against the wishes of the majority of respondents in the area recommended and is in fact democratic as it is supported by the people that want it and only proposed in a group of streets where the local residents want it most.</p> <p>The statutory consultation period has allowed a further chance for the residents within the zone to object to the zone; only 14 of the 168 representations stated that they were from the area and that they objected to the zone, most of these from Elsie Road.</p>	<p>Reject</p>
5.	<p>Against double yellow lines in front of kerbs at drives- Elsie Rd</p>	<p>Southwark Council has engaged with residents and maintains that provision of double yellow lines across driveways as the most viable solution for the area compared to the alternative of a single yellow line. This would need an associated restricted parking zone and “permit holders past this point” signs for individual roads or the whole zone. Restricted parking zones are problematic as they can be confusing for motorists and therefore enforcement would be subject to scrutiny and zone operation compromised. In addition, they would require significantly more signage leading to street clutter and with associated impacts on people with disabilities or with autism, dementia and Alzheimer’s.</p> <p>As Elsie Road has a significant amount of driveways, a site visit was conducted before the statutory consultation to engage with residents and to subsequently reduce the double yellow lines at kerbs to only one metre either side of the dropped kerb. This required a departure from the council's design standards which state that double yellow lines should extend two metres either side of a vehicle crossover. The design departure created approximately seven additional parking spaces. The road safety risk was assessed for the individual decision making to proceed to statutory consultation, and is considered acceptable.</p>	<p>Reject</p>

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6.	No problem with parking	<p>The consultation results of majority support (62%) for a parking zone from respondents in the area demonstrates that parking is considered a problem.</p> <p>Parking Monday to Friday was difficult for the majority (63%) of respondents. In addition, it was difficult to park in the evenings, on a Saturday or on a Sunday for 40%, 39% and 25% of respondents, respectively. Cycle parking difficulty was experienced by over a quarter (28%) of respondents in the revised area with the most in Derwent Grove (27, 37% of respondents in the street), Melbourne Grove (15, 43%) and East Dulwich Grove (13, 41%).</p>	Reject
7.	Insufficient parking space in Elsie Rd, (due to too many residences, and if residents buy more than one permit)	<p>The implementation of a parking zone is likely to reduce the amount of cars in the area by roughly 40%. Parking for residents and their visitors is likely to become easier. Evidence for this has been seen in recently implemented schemes such as Q zone, including streets similar to Elsie Road with off-street parking via access drives over which double yellow lines were added and where there were up to five vehicles per household (NB , residents are allowed up to three permits per household).</p> <p>Officers will be instructed to review the parking zone six to nine months after implementation to ensure the zone is fit for purpose, and questions will include whether residents are finding it difficult to park.</p>	Reject
8.	Cost of resident permit	The price of an annual resident permit has not changed for almost eight years. Permit prices are set by Cabinet and are benchmarked with charges in other inner London Boroughs.	Reject
9.	Money making scheme	Implementation costs are covered by the parking revenue budget which legally must be reinvested back into highway improvements.	Reject
10.	CPZ will be extended eventually due to displacement	One of the known outcomes of parking restrictions is parking displacement. Unfortunately we cannot foresee the effect of the zone on other areas at this stage and will continually monitor the impact.	Reject

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11.	Negative impact on staff wanting to park by their place of work	<p>Southwark council aims to reduce trips made by car/motorbike to 13% by 2041 (Movement Plan, 2019). The parking zone is adjacent to East Dulwich station and a number of bus routes provide public transport alternatives to the car with the level of accessibility to public transport (PTAL) ranging from 4 around East Dulwich station to 2 by Green Dale. Walking and cycling infrastructure in the area is being developed by the council in line with Healthy Streets principles (Southwark Spine, Cycleway 17 (Quietway 7), and traffic improvements are being developed as part of our Healthy Streets Dulwich. Southwark council therefore encourages active travel for people working in the borough.</p> <p>Businesses may nevertheless apply for business permits for staff if it can be demonstrated that the vehicle is used for purposes other than just commuting.</p>	Reject
12.	Insufficient parking spaces for high street visitors due to displacement into unrestricted areas	<p>One of the known outcomes of parking restrictions is parking displacement however it is difficult to predict with accuracy how much displacement will occur and where this will occur.</p> <p>Empirical evidence from a study conducted in March 2019, shows that during the week of those visitors coming to Lordship Lane for the purposes of shopping or leisure, the proportion travelling by private vehicle (car/taxi) is only 6%. During the week 30% of visitors surveyed said shopping or leisure was their reason for visiting while during the weekend the proportion rose to 65%. The 2015 study on Lordship Lane also stated that three times the footfall occurs on a Saturday. The displacement issue would be limited to the zone operation Monday to Friday and therefore would not affect the main day of trade (Saturday) and would impact only a very small portion of people travelling by car, many of whom could switch to public transport, walking or cycling as most journeys made are 14 minutes or less . Based on results from these studies the potential displacement of parking is highly unlikely to have a significant effect trade on the high street.</p> <p>Results of these studies can be found on www.southwark.gov.uk/eastdulwichparking</p>	Reject

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13.	Objection to design - proposed stop and rest Derwent Grove	<p>Comments from the consultation responses and conversations with road users revealed that people with mobility issues, pregnant and breast feeding women, and the elderly, welcomed places to stop and rest in the street when walking and cycling to local destinations such as the high streets in the neighbouring areas.</p> <p>Placeholders for stop and rest features will be retained by way of double yellow lines provided that further consultation is conducted on the use of the spaces after the zone is implemented. These uses may be stop and rest (buildout/parklet with one or two seats intended for elderly and less mobile), cycle parking bay, planting or other feature, designed with input from the Metropolitan Police. Alternatively in the event that there is insufficient support for alternative use, a parking bay may be installed.</p>	Reject
14.	Problem not caused by commuters - zone will not be effective	An all-day zone is proposed which addresses not just commuter parking issue but a range of parking issues in the area caused by the presence of a number of schools and other destinations and workplaces such as services and shops. Dulwich community hospital is also in construction and thought to be a source of future parking stress.	Reject
15.	Will increase parking in housing estate - estate should have permit parking at same time	Colleagues in the Housing department have been informed of the consultation. The housing resident officers are responsible for implementing Housing estate parking permit systems.	Reject
16.	Cost of business permit	Permit prices are set by Cabinet and are benchmarked with charges in other inner London Boroughs.	Reject
17.	Will not improve air quality. Idling of school children drop off vehicles as parents/carers not able to park; people will drive around the area looking for parking spaces	<p>Reducing car parking availability has been found to predict change from car use to other modes of travel (Jaffe, E. (2016) 'The Strongest Case Yet That Excessive Parking Causes More Driving' (Accessed: 12 July 2018) Available at: www.citylab.com/transportation/2016/01/the-strongest-case-yet-that-excessive-parking-causes-moredriving/423663/ as referenced in the council's Movement Plan 2019)</p> <p>The parking zone will result in fewer commuters driving around looking for a parking space. Parents or carers wishing to park and drop children at schools will be discouraged by the permit and paid bays, while the new At Any Time restrictions at junctions near schools will remove the 5 minute informal grace period for school drop off currently available at regular double yellow lines and will therefore reduce school drop off traffic. The reduction of car use in the area will therefore reduce congestion and emissions and therefore improve air quality.</p>	Reject

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18.	Objection to design in Tell Grove (stop and rest)	<p>Placeholders for stop and rest features will be retained by way of double yellow lines provided that further consultation is conducted on the use of the spaces after the zone is implemented. These uses may be stop and rest (buildout/parklet with one or two seats intended for elderly and less mobile), cycle parking bay, planting or other feature. , designed with input from the Metropolitan Police. Alternatively in the event that there is insufficient support for alternative use, a parking bay may be installed.</p> <p>It should be noted that in Tell Grove representations of support were also received for stop and rest points.</p>	Reject
19.	Objection to design in Tell Grove/Matham grove (DYL on outside bend)	The design will be amended to remove double yellow lines on the outside of the bend, subject to feasibility at further design stage.	Uphold
20.	Penalised at school holiday times when parking not an issue	Parking zones operate all year and suspending operation in school term times would be confusing for motorists who may not be aware of term times and therefore enforcement would be subject to scrutiny from the public and would negatively affect the integrity if the zone operation.	Reject
21.	6 day week not supported	<p>This objection is unclear and as it is from a business it may refer to the short stay bays “stop and shop” operating Monday to Saturday. Current free half hour parking already operate all day Monday to Saturday. The “Stop and Shop” bays will offer more flexibility for shoppers than the current half hour restriction in that visitors will be able to extend their stay for up to two hours for a fee, after the initial first half hour free, thus allowing more time to make use of shops, cafes and other amenities in the local area.</p> <p>The council therefore trusts it has provided a solution that provides a balance between addressing parking stress and concerns about the high street. Officers will nevertheless be instructed to review the parking zone six to nine months after implementation to ensure the zone is fit for purpose, and for a decision to be made to retain or amend operation days and times in consideration of the consultation results.</p>	Reject
22.	Parking problems caused by DYL junction protection	<p>The implementation of a parking zone is likely to reduce the amount of cars in the area by roughly 40%. Parking for residents and their visitors is likely to become easier.</p> <p>Double yellow line junction protection ensures adequate sight lines for the most vulnerable road users (small children and wheelchair users for example).</p>	Reject

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23.	There is a problem with parking but a parking zone will not solve it	Based on previous zones, the implementation of a parking zone is likely to reduce the amount of cars in the area by 40% or more. Parking for both residents visitors is likely to become easier as there will be more space.	Reject
24.	Negative impact on deliveries	<p>Deliveries are able to offload at loading bays and also at double yellow lines where it is safe to do so for up to 40 minutes.</p> <p>Officers will be instructed to review the parking zone six to nine months after implementation to ensure the zone is fit for purpose, and for a decision to be made to retain or amend operation days and times in consideration of the consultation results.</p>	Reject
25.	Cost of stop and shop bays for visitors	Currently visitors should only be parking for half an hour in the short stay bays. The stop and shop bays proposed include the first half hour free and therefore there is no extra cost for visitors compared to the current situation. Fees are charged only after the first half hour free and registration is required to obtain the first half hour free.	Reject
26.	High street visitors will reduce - visitors won't shift from cars to walking / cycling or to public transport due to poor east-west links	Reducing car parking availability has been found to predict change from car use to other modes of travel (Jaffe, E. (2016) 'The Strongest Case Yet That Excessive Parking Causes More Driving' (Accessed: 12 July 2018) Available at: www.citylab.com/transportation/2016/01/the-strongest-case-yet-that-excessive-parking-causes-moredriving/423663/ as referenced in the council's Movement Plan 2019)	Reject
27.	Will restrict parking	<p>Based on previous zones, the implementation of a parking zone is likely to reduce the amount of cars in the area by 40% or more. Residents will be able to obtain a permit for a fee of £125 per year (current fees). Parking for visitors is likely to become easier as there will be more space. Visitors will be able to park in permit bays where one hour, five hour and all day visitor passes may be purchased by residents. Residents who have a Blue Badge can apply to have a disabled parking bay outside of their home. In addition, visitors can stay for a maximum of two hours for a fee in permit and paid bays.</p> <p>Officers will be instructed to review the parking zone six to nine months after implementation to ensure the zone is fit for purpose, and for a decision to be made to retain or amend operation days and times in consideration of the consultation results. Although officers are confident an all-day zone is a proportionate measure to address the local parking issues, in the event an all-day zone is found too restrictive by the majority of respondents, officers will explore changing or reducing the operation subject to statutory consultation.</p>	Reject

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28.	Trades people needing to park long hours	<p>Residents’ concerns that an all-day zone would not allow visitors such as informal carers, tradespeople and deliveries are unfounded. Based on previous zones, the implementation of a parking zone is likely to reduce the amount of cars in the area by 40% or more. Parking for visitors is likely to become easier as there will be more space. Visitors will be able to park in permit bays where one hour, five hour and all day visitor passes may be purchased by residents.</p> <p>Residents who have a Blue Badge can apply to have a disabled parking bay outside of their home.</p>	Reject
29.	Change to 08.00-6.00 to prevent school drop off parking	<p>An earlier start time would need to be re-advertised and the council has provided for At Any Time restrictions which prevent dropping off of children as there will be no provision for a grace period. Therefore the dropping off of children is likely to significantly reduce.</p> <p>Officers will be instructed to review the parking zone six to nine months after implementation to ensure the zone is fit for purpose, and for a decision to be made to retain or amend operation days and times in consideration of the consultation results. In the event for example that there is majority support for a start time of 8am officers would explore changing the operation subject to statutory consultation.</p>	Reject
30.	Will make it difficult to care/deliver food for disabled families and for repairs	<p>Residents’ concerns that an all-day zone would not allow visitors such as informal carers, tradespeople and deliveries are unfounded. Based on previous zones, the implementation of a parking zone is likely to reduce the amount of cars in the area by 40% or more. Parking for visitors is likely to become easier as there will be more space. Visitors will be able to park in permit bays where one hour, five hour and all day visitor passes may be purchased by residents.</p> <p>Residents who have a Blue Badge can apply to have a disabled parking bay outside of their home.</p>	Reject
31.	Controlled parking in Blackwater Street is not necessary.	The proposals do not include Blackwater Street for inclusion in the zone therefore this objection is not valid.	Reject
32.	Does not comply with s. 122(2)(b) Road Traffic Regulation Act 1984 Act in regards ‘to the effect on the amenities of any locality affected’	The locality is restricted to the streets subject to statutory consultation. Amenity of these streets is very likely to be improved through less cars parked in the road, increased space to be used for alternative uses such as planting or cycle parking bays subject to statutory consultation, less congestion caused by people looking for parking, and less noise and air pollution caused by car emissions.	Reject

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33.	Should wait until ULEZ (will reduce amount of vehicles)	ULEZ may reduce vehicles but will not necessarily reduce parking pressure. It is therefore not considered a valid alternative to a parking zone.	Reject
34.	Design: motorbike parking will be used by Pizza Gogos 8 x scooters- should move closer to Pizza Gogo	The proposed motorcycle bay was requested by a resident in Trossachs Road and is located at the end of the road closest to East Dulwich Grove in the vicinity of the pizza restaurant and therefore would be sufficiently close to be used by both residents and businesses.	Reject